



**c. Possible joinder of additional parties;**

Response: Plaintiff anticipates that additional individuals will join this matter as opt-in plaintiffs. Additionally, discovery may warrant the inclusion of additional Defendants.

Defendant: Defendant does not anticipate joining additional parties.

**d. Any anticipated challenges to jurisdiction or venue;**

Response: None.

**e. Date by which the case will be ready for trial and estimated length of trial.**

Response: The Parties propose August 2018, as the trial date. The Parties estimate that a trial of this case would be less than one week. A jury has been demanded.

**f. The desirability of ADR, and the timing for ADR; and**

Response: The parties are open to resolving this matter through mediation once the composition of the class, if any, is known. The parties are also open to resolution through less formal discussions as well.

**g. Any objections to disclosure under Rule 26(a)(1).**

Response: None.

**Rule 26(f) Subjects**

- a) What changes should be made in the timing, form, or requirement for disclosures under Rule 26(a), including a statement of when initial disclosures were made or will be made;**

The Parties anticipate making initial disclosures by June 20, 2017.

- b) The subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused on particular issues;**

The Parties anticipate taking discovery on Plaintiff's job duties, hours of work, compensation, employment agreement and Defendant's affirmative defenses.

Discovery does not need to be phased or limited.

- c) **Any issues about disclosure, discovery, or preservation of electronically stored information, including the form or forms in which it should be produced;**

None at this time.

- d) **Any issues about claims of privilege or of protection as trial-preparation materials, including—if the parties agree on a procedure to assert these claims after production—whether to ask the court to include their agreement in an order under Federal Rule of Evidence 502;**

The Parties do not foresee any issues at this time and do not need an order under Federal Rule of Evidence 502.

- e) **What changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed;**

None at this time.

- f) **Any other orders that the court should issue under Rule 26(c) or under Rule 16(b) and (c).**

None at this time.

Respectfully submitted,

/s/ J. Derek Braziel

**J. DEREK BRAZIEL**

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record through the Court's ECF system as of the date file-stamped thereon.

/s/J. Derek Braziel  
**J. DEREK BRAZIEL**